

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ALIANZA AMERICAS, YANET DOE, PABLO
DOE, and JESUS DOE, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

VERTOL SYSTEMS COMPANY, INC.,

Defendant.

Civil Action No.: 1:22-cv-11550-ADB

MOTION TO CLARIFY

Defendant Vertol Systems Company, Inc. (“Vertol”) files this motion to clarify its position in response to the joint report and proposed scheduling order filed by Plaintiffs’ counsel in this matter.

After much back and forth between the parties, Plaintiffs filed the “joint report” at 6:11 p.m., before Vertol had an opportunity to respond to a 6:05 p.m. email. Plaintiffs did not request or receive authorization to file the joint submission before filing, and Vertol would not have authorized the filing of this version of the joint report.

To clarify the parties’ positions as they currently stand: (1) Vertol seeks bifurcated class and merits discovery and seeks an order that would allow Plaintiffs, collectively, and Vertol each to be allowed 10 depositions during class discovery and 10 depositions during merits discovery; and (2) Plaintiffs do not seek bifurcated class and merits discovery, and seek an order that would allow Plaintiffs, collectively, and Vertol each to be allowed 10 depositions during combined class and merits discovery. Neither proposal dictates how many depositions should occur during expert discovery.

Respectfully submitted,

/s/ Brian T. Kelly

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Counsel for Vertol Systems Company, Inc.

Dated: April 19, 2025

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically on April 19, 2025, and thereby delivered by electronic means to all registered participants as identified on the Notice of Electronic Filing.

/s/ Ross MacPherson

Ross MacPherson